

## **EXHIBIT 14**



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# Transcript of Tranquillo Villegas

**Date:** July 28, 2022

**Case:** Timbers -v- Telligent Masonry, LLC, et al.

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	33		35
<b>1 A Not other than what I read.</b>		<b>1 A Don't remember.</b>	
2 Q But you yourself prior to Mr. Timbers		2 Q And according to the information we have	
3 being fired were not aware of anything?		3 provided, a number of masons at the Faraday site	
<b>4 A No.</b>		4 were told to go to the Gainesville Prince William	
5 Q Were you aware at all that Mr. Timbers had		5 High School site, are you aware of that?	
6 worked and left and worked and left and worked and			
7 left Telligent? You're not aware of that?			
<b>8 A No.</b>		<b>6 A Yes.</b>	
9 Q Is that something that happens a lot in		7 Q Were you aware at the time that was	
10 your industry? Masons come, masons go, masons		8 happening?	
11 come back, masons go?		<b>9 A No.</b>	
<b>12 A Yes.</b>		10 Q When did you learn that there had been	
13 Q Is it unusual for a mason to come to		11 that reassignment of masons?	
14 Telligent, work some and then maybe go work for		<b>12 A In our weekly meeting.</b>	
15 another masonry company and then when that job is		13 Q So that would have happened -- could that	
16 done come back to Telligent?		14 have happened the following week?	
<b>17 A Yes.</b>		<b>15 A Correct.</b>	
18 Q Happens a lot?		16 Q When typically are the weekly meetings?	
<b>19 A Yes.</b>		<b>17 A Tuesdays.</b>	
20 Q Nothing unusual about that?		18 Q In the morning I guess?	
<b>21 A No.</b>		<b>19 A At 1:00.</b>	
22 Q Mr. Valladares said in one of the e-mails,		20 Q At 1:00?	
	34	<b>21 A (No oral response.)</b>	
		22 Q So if that happened Thursday, Friday you	
1 and we'll look at that in a little bit, that the			36
2 Timbers family were troublemakers.		1 would have found out about that reallocation at	
3 You may have read that but did anyone have		2 the following Tuesday weekly meeting?	
4 any conversation with you about the Timbers family		<b>3 A Yes.</b>	
5 at all?		4 Q Were you involved at all in that decision?	
<b>6 A No.</b>		<b>5 A No.</b>	
7 Q Other than -- and I'm going to ignore		6 Q Had you ever had any conversations with	
8 September 23rd when there's a bunch of e-mails		7 Mr. Valladares about Mr. Timbers, David Timbers	
9 about Mr. Timbers.		8 prior to Mr. Timbers being fired?	
10 Prior to that did anyone have any		<b>9 A No.</b>	
11 conversations with you about Mr. Timbers?		10 Q Do you recall having any conversations at	
<b>12 A No.</b>		11 all with Mr. Valladares again prior to Mr. Timbers	
13 Q Through the documentation we have and		12 being fired about the Timbers family?	
14 through the evidence that we've seen, it appears		<b>13 A No.</b>	
15 that at one point in August, and specifically		14 Q Any family members of Timbers'?	
16 looking at August 20th, 21st, that work at --		<b>15 A No.</b>	
17 masonry work at Faraday stopped we believe because		16 Q Do you know how long work was stopped at	
18 of some window issue perhaps.		17 Faraday in August of 2020?	
19 Are you aware of there being a time where		<b>18 A No.</b>	
20 Faraday had to be put on hold for a few days?		19 Q We have been provided in discovery your	
<b>21 A Yes.</b>		20 phone records which indicate that on December 16,	
22 Q Do you know why?		21 2020 you received two phone calls from	
		22 Mr. Timbers.	

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1 Q Is it fair to say that's a very rare		1 Q Are there any training schools for masons?	
2 occurrence?		2 A Yes.	
3 A Yes.		3 Q Do you send information to the training	
4 Q And from your recollection may have		4 schools?	
5 happened how many times?		5 A No.	
6 Since you've been there how many times has		6 Q Is there some form of apprentice program	
7 that -- are you aware that a mason has been sent		7 for masons that you're aware of?	
8 off not to return?		8 A We have our own program.	
9 A Don't remember.		9 Q So someone could come in with no	
10 Q Rare?		10 experience and you would try to teach them to be a	
11 A Yes.		11 mason?	
12 Q You would say it's rare?		12 A Yes.	
13 A Yes.		13 Q Is it usual for -- you have laborers who	
14 Q Unusual?		14 move brick and do things like that, correct?	
15 A Yes.		15 A Yes.	
16 Q Maybe five times, less than?		16 Q Do those persons ever get trained to	
17 A Maybe.		17 become masons?	
18 Q But not more than five?		18 A Yes.	
19 A No, we --		19 Q Is that a usual thing, unusual thing?	
20 Q Work them?		20 A Everyday.	
21 A Yes.		21 Q Is it usual or unusual for someone to be a	
22 Q You work them. If a mason is		22 laborer and just stay as a laborer during their	
	42		44
1 inconsistent, if he shows up, doesn't show up,		1 time with Telligent?	
2 shows up you guys still will work him when he		2 A Yes.	
3 shows up, correct?		3 Q So some people are just laborers and some	
4 A Yes.		4 people are masons and some people may be laborers	
5 Q And as you indicated, you're not aware of		5 who try to become trained as masons?	
6 anybody ever being terminated because they got		6 A Yes.	
7 into a fight with another mason?		7 Q You're aware that on September 23rd -- do	
8 A No.		8 you know who Tia Taylor is or was?	
9 Q Did Mr. Valladares ever tell you that he		9 A Yes.	
10 did not want Mr. David Timbers working on a site		10 Q I guess she still is.	
11 where Valladares was the Foreman?		11 A Yes.	
12 A No.		12 Q To your understanding who was she?	
13 Q How does Telligent find masons?		13 A H.R.	
14 A They call. They call the office. They		14 Q Are you aware that she had a conversation	
15 call our Foreman. They call our Superintendent.		15 with David Timbers on September 23rd?	
16 They call me.		16 A From what I read, yes.	
17 Q So is there anything Telligent does to		17 Q Are you aware that Ms. Tia Taylor	
18 recruit masons, to find masons, advertise for		18 undertook an investigation on September 23rd?	
19 masons?		19 A From what I read, yes.	
20 A Yes.		20 Q Did she call you on the 23rd about	
21 Q What do they do?		21 Mr. Timbers?	
22 A It's an app on the web and we --		22 A I don't recall.	

<p>1 Q How do you find out about it?</p> <p>2 <b>A From safety or from e-mails.</b></p> <p>3 Q But you don't recall anything specific</p> <p>4 about a claim of Mr. Timbers being injured on the</p> <p>5 job site?</p> <p>6 <b>A No.</b></p> <p>7 MR. TOLAND: Mark this as Exhibit 2. This</p> <p>8 is for those playing along at home Telligent Bates</p> <p>9 number 89 and 90. This will be Exhibit 2.</p> <p>10 (Villegas Deposition Exhibit 2 was marked</p> <p>11 for identification and attached to the</p> <p>12 transcript.)</p> <p>13 BY MR. TOLAND:</p> <p>14 Q Let me know when you're done looking it</p> <p>15 over.</p> <p>16 (Pause in the proceedings.)</p> <p>17 <b>A Okay.</b></p> <p>18 Q Do you recall seeing this form before?</p> <p>19 <b>A No.</b></p> <p>20 Q And you don't recall seeing this form as</p> <p>21 part of an e-mail that was sent to you?</p> <p>22 <b>A I don't remember.</b></p>	<p>49</p> <p>1 everything that David Timbers builds -- this is on</p> <p>2 page two if you want to follow along. It's on</p> <p>3 Bates number 90. It states that "everything David</p> <p>4 builds must be torn back down and rebuilt."</p> <p>5 Had anybody ever mentioned anything to you</p> <p>6 that work that David Timbers builds has to be torn</p> <p>7 back down and rebuilt?</p> <p>8 <b>A After all this happened I learned this by</b></p> <p>9 <b>Jose but before that --</b></p> <p>10 Q Prior to that no?</p> <p>11 <b>A No.</b></p> <p>12 Q Did you ever get a complaint from any</p> <p>13 Foreman prior to him being terminated that</p> <p>14 Timbers' work needed to be torn down and rebuilt?</p> <p>15 <b>A No.</b></p> <p>16 Q Did you ever get any complaint relayed to</p> <p>17 you from any of your supervisors that Mr. Timbers'</p> <p>18 work needed to be torn down and rebuilt?</p> <p>19 <b>A No.</b></p> <p>20 Q Never got any complaint about Mr. Timbers</p> <p>21 at all from anybody prior to him being terminated,</p> <p>22 correct?</p>
<p>50</p> <p>1 Q Did you ever have any conversations with</p> <p>2 Jose Valladares about the claim -- about</p> <p>3 Mr. Timbers' claim that Jose Valladares was</p> <p>4 refusing Mr. Timbers and his brother's work</p> <p>5 because they were African-Americans?</p> <p>6 <b>A No.</b></p> <p>7 Q Did you ever hear prior to Mr. Timbers</p> <p>8 being terminated that he was going to report the</p> <p>9 company to the Labor Board?</p> <p>10 <b>A No.</b></p> <p>11 Q Did you ever hear prior to Mr. Timbers</p> <p>12 being terminated that he was going to make a</p> <p>13 complaint to the EEOC?</p> <p>14 <b>A No.</b></p> <p>15 Q And you don't recall having any</p> <p>16 conversations about Mr. Timbers with anybody on</p> <p>17 the 23rd?</p> <p>18 <b>A No.</b></p> <p>19 Q You don't even recall seeing the e-mails,</p> <p>20 do you?</p> <p>21 <b>A No.</b></p> <p>22 Q There's a statement in here that</p>	<p>52</p> <p>1 <b>A Correct.</b></p> <p>2 Q If there was a problem with an employee</p> <p>3 whose work constantly needed to be torn down and</p> <p>4 rebuilt, is that something that would have been</p> <p>5 reported to your Superintendents?</p> <p>6 <b>A Yes.</b></p> <p>7 Q Is that something your Superintendents</p> <p>8 would have reported to you?</p> <p>9 <b>A Not necessarily but yes.</b></p> <p>10 Q If a Superintendent found out that</p> <p>11 someone's work constantly needed to be torn down</p> <p>12 and rebuilt, what were they supposed to do?</p> <p>13 <b>A Try to teach them the right way.</b></p> <p>14 Q But you're not aware of any conversations</p> <p>15 about the quality of Mr. Timbers' work?</p> <p>16 <b>A No.</b></p> <p>17 Q In this there's also a suggestion that</p> <p>18 Mr. Valladares had been threatened by Mr. Timbers</p> <p>19 three times in the past few weeks.</p> <p>20 What is a Foreman supposed to do if</p> <p>21 somebody threatens him with violence?</p> <p>22 <b>A Let his Superintendent know.</b></p>